

# **Response to Comments Received** **NTP Fact Sheet: DOE's Motor Carrier Evaluation Program**

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>Transportation Resource Exchange Center, ATR Institute, University of New Mexico</p> <p>-----</p> <p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>Transportation Resource Exchange Center, ATR Institute, University of New Mexico</p>	<p><b><u>1<sup>st</sup> page, 1<sup>st</sup> column, 1<sup>st</sup> paragraph:</u></b></p> <p>In the 2<sup>nd</sup> sentence: Insert “high” before “quality”.</p> <p>The subheading “Program Improvements” seems out of place when the original program is hardly discussed.</p> <p>-----</p> <p>--</p> <p>1<sup>st</sup> paragraph heading: Changes of heading suggested are: “Program Revisements” and “Program Components.”</p> <p>Reference the 1<sup>st</sup> paragraph, 3<sup>rd</sup> sentence: Replace “For a decade . . .” with “For the past 10 years . . .”.</p> <p>-----</p> <p>--</p> <p><b><u>1<sup>st</sup> page, 1<sup>st</sup> column, 2<sup>nd</sup> paragraph:</u></b></p> <p>In the 2<sup>nd</sup> paragraph, 1<sup>st</sup> sentence, delete the commas after “of” and with”. In the next sentence, put “with 3 to 5 years between visits” in parentheses, and insert a comma before “and were based....”.</p> <p>-----</p> <p>--</p> <p>The 1<sup>st</sup> sentence of the 2<sup>nd</sup> paragraph is unclear; consider revising as suggested: Previous versions of the program</p>	<p>Comment incorporated.</p> <p>Comment incorporated. Headers deleted.</p> <p>-----</p> <p>--</p> <p>Headers have been deleted.</p> <p>Text rephrased to delete reference to time.</p> <p>-----</p> <p>--</p> <p>Paragraph deleted.</p> <p>-----</p> <p>--</p> <p>Paragraph deleted.</p>

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Transportation Resource Exchange Center, ATR Institute, University of New Mexico -----	used evaluations to ensure that carriers transporting DOE owned materials were knowledgeable of and compliant with regulations. 2 <sup>nd</sup> sentence, same paragraph: Style, consider revising as follows: Evaluations were performed on a 3 to 5 year, rotational basis and were based on information obtained directly from the carrier, from sites using that carrier and from statistical information gathered by the U.S. Department of Transportation (DOT) from roadside inspections and compliance reviews. -----	Paragraph deleted.  -----
Council of State Governments Midwestern High-Level Radioactive Waste Committee -----	-- <b><u>1<sup>st</sup> page, 2<sup>nd</sup> column:</u></b>  In the 1 <sup>st</sup> sentence, change “introduces” to “makes use of”; change “uses” to “supplements” and replace “and adds” with “with”. Delete “into the MCEP” from the end of the sentence. -----	--  Comment partially incorporated.  -----
Transportation Resource Exchange Center, ATR Institute, University of New Mexico -----	-- 1 <sup>st</sup> paragraph, 1 <sup>st</sup> sentence: “. . . introduces a statistical database . . .”. Is there a name for this database? Who maintains the database?  In the same sentence, “. . . and adds key elements . . .”. What are these key elements? -----	-- The fact sheet is addressing the MCEP database maintained by DOE and supplemented with information with DOT SafeStat data.  Comment not incorporated; too much detail.  -----
Council of State Governments Midwestern High-Level Radioactive Waste Committee -----	--  Start the 2 <sup>nd</sup> sentence: “With (or through) this database, a carrier’s safety and operational performance...”  What are the “minimum DOE standards” (second sentence).	--  Sentence deleted.

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Exchange Center, ATR Institute, University of New Mexico	----- -- In the 2 <sup>nd</sup> sentence of that paragraph: “. . . creates a process by which . . .”. Consider revising: “. . . creates a system in which . . .”.	----- --
----- Council of State Governments Midwestern High-Level Radioactive Waste Committee	In the same sentence: “. . . a carrier’s safety and operational performance . . . on a continuing basis.” Issues of style and clarity. Consider revising as follows: “. . . in which carrier operational safety and performance is continually measured against other carriers and a set of minimum DOE standards.”	Sentence deleted.
	Also, in the same sentence: “. . . minimum DOE standards . . .”. What are the minimum DOE standards? -----	Sentence deleted.
	-- Change the 3 <sup>rd</sup> sentence to read: “More importantly, the MCEP is now proactive rather than reactive: the ongoing monitoring process will identify carrier problems and negative trends that can be addressed before becoming serious enough to require a carrier’s removal from the list of qualified carriers.”	-- Comment partially incorporated. Sentence moved to end of fact sheet.
----- Transportation Resource Exchange Center, ATR Institute, University of New Mexico	“Role of Federal and State Inspections.” There is too little information on the role of federal and state inspectors to warrant a separate subheading. Start the first sentence in this section with “The MCEP database”. Make “score” plural in the last line. -----	Comment partially incorporated. Headers deleted. “Score” deleted from text.
	-- The 3 <sup>rd</sup> sentence has 39 words; consider breaking it up.	-- Sentence rewritten and moved to end of fact sheet.

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<p>Transportation Resource Exchange Center, ATR Institute, University of New Mexico</p> <p>-----</p> <p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>Transportation Resource Exchange Center, ATR Institute, University of</p>	<p>3<sup>rd</sup> paragraph, 1<sup>st</sup> sentence: “This database . . .”. Database name should be included (if available).</p> <p><b><u>1<sup>st</sup> page, 3<sup>rd</sup> column:</u></b></p> <p>1<sup>st</sup> sentence: “. . . about carriers’ . . .” (and “carrier’s” in other places). To ensure consistency throughout document, change to “. . . about carrier . . .”.</p> <p>2<sup>nd</sup> paragraph, 3<sup>rd</sup> sentence: “. . . DOE Traffic Managers . . .”. Who are the DOE Traffic Managers and what do they do?</p> <p>-----</p> <p>--</p> <p><b><u>2<sup>nd</sup> page, 1<sup>st</sup> column:</u></b></p> <p>Before the section on “Onsite Carrier Evaluations,” the fact sheet should mention how carriers are rated and/or selected. That is, there is no statement that <i>only</i> carriers with a high score will be chosen (or that carriers with low scores will <i>not</i> be chosen).</p> <p>The text should better illustrate the differences between the DOT and DOE requirements. For example, compare the different number of “verifiable years of experience” required by the two agencies.</p> <p>-----</p> <p>“Operational Performance Records:” Change the first sentence to read: “Carriers will also be graded on their</p>	<p>Comment incorporated.</p> <p>Comment incorporated.</p> <p>Comment not incorporated. That level of detail not necessary.</p> <p>-----</p> <p>--</p> <p>Comment partially incorporated. The 3 stages of evaluation are addressed in the fact sheet as is the fact that carriers not meeting minimum standards are dropped from the program.</p> <p>Comment not incorporated; too much detail.</p> <p>Comment partially incorporated. Section was rewritten.</p>

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New Mexico	operational performance for DOE.”	
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Council of State Governments Midwestern High-Level Radioactive Waste Committee	-- 1 <sup>st</sup> paragraph, 3 <sup>rd</sup> sentence: Consider revising entire sentence as follows: “This includes standards such as verifiable years of experience transporting hazardous materials, carrier ability to respond to hazardous material incidents occurring enroute, proof of adequate levels of insurance and continued training of drivers and operations personnel in the handling and transporting of hazardous materials.”	-- Comment partially incorporated.
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Transportation Resource Exchange Center, ATR Institute, University of New Mexico	-- <b><u>2<sup>nd</sup> page, 2<sup>nd</sup> column:</u></b>  In the 1 <sup>st</sup> full sentence, Make “score” and “ranking” plural.	-  Text has been deleted.
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Council of State Governments Midwestern	The 2 <sup>nd</sup> paragraph mentions that the monitoring process will be completed twice a year, but the End User Survey is completed annually. Does the monitoring process use “old” information for the mid-year update?  The 2 <sup>nd</sup> sentence of that paragraph refers to competent carriers’ scores and rankings being adjusted accordingly. It would seem that <i>all</i> carriers’ scores and rankings would be adjusted accordingly – i.e., the “good carriers will see their scores go up, the “bad” ones will see them	Text reworded to clarify.  Text has been deleted.

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<p>High-Level Radioactive Waste Committee</p> <p>-----</p> <p>Transportation Resource Exchange Center, ATR Institute, University of New Mexico</p>	<p>go down.</p> <p>-----</p> <p>--</p> <p>2<sup>nd</sup> paragraph, 2<sup>nd</sup> sentence: “. . . fall below DOE minimum standards will have those problems identified to them . . .”. Style and clarity, consider revising as follows: “. . . fall below DOE minimum standards will be notified and given a specific timeframe in which to resolve the discrepancies.”</p> <p><b><u>2<sup>nd</sup> page, 3<sup>rd</sup> column:</u></b></p> <p>Two of the three things in the summary were not discussed in the fact sheet: evaluating large regional/national carriers as well as local/small regional ones; scores and rankings being posted on the Internet.</p> <p>-----</p> <p>--</p> <p>General Comment: Who is able to see the (1) Annual End User Surveys and (2) Monitoring Reports?</p> <p>Will carriers have access to either of the above?</p> <p>1<sup>st</sup> paragraph, 2<sup>nd</sup> sentence: “. . . national motor carriers, but at the same time provide . . .”. Sentence flow, clarity. Consider revising as follows “. . . national motor carriers and, at the same time, provide . . .”.</p> <p><b><u>General Comments:</u></b></p> <p>Are there any documents, such as DOT databases or DOE Orders that can be cited?</p> <p>Is there a Web site or another source of information for MCEP?</p>	<p>-----</p> <p>--</p> <p>Comment incorporated.</p> <p>Summary deleted.</p> <p>-----</p> <p>--</p> <p>These are internal reports available only to DOE/contractor traffic personnel.</p> <p>No.</p> <p>Sentence deleted.</p> <p>DOT SafeStat database is referenced in fact sheet.</p> <p>Information will eventually be loaded on NTP Web site.</p>
<p>Transportation Resource Exchange Center, ATR Institute, University of New Mexico</p>		

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	<p>Regarding the comment/evaluation sheet: In order to better evaluate the strengths and weaknesses of your document(s), it is recommended that the yes-no answer format be replaced with a five point scale.</p> <p>Overall, the sentences are too lengthy. There are often multiple ideas presented in a single sentence.</p> <p>Improve sentence flow and, in some cases, word choice.</p>	<p>Comment not incorporated.</p> <p>Sheet has been rewritten.</p> <p>Comment incorporated. Fact sheet was rewritten.</p>